

# EXHIBIT 122

**DECLARATION UNDER PENALTY OF PERJURY  
PURSUANT TO 28 U.S.C. § 1746  
AND/OR  
SWORN STATEMENT IN ACCORDANCE WITH GEORGIA LAW**

1. My name is Shannon Gaggero. I am over eighteen years of age and competent to testify to the matters contained herein.
2. I am a resident of Fulton County in Georgia and my residence address is [REDACTED] [REDACTED] NE, Atlanta, GA, 30306.
3. On election day, November 6, 2018, I served as a Poll Watcher at the Little 5 Points Community Center in Fulton County from about 8:00 am until 2:00 pm.
4. As a general matter, I found the poll workers to be welcoming and professional. I appreciate how they accommodated voters with visible or expressed challenges. They let those voters go to the head of the line and were quite helpful.
5. I did, however, observe several matters that raised some concerns.
6. For example, the lines in this precinct were quite long. When I arrived in the morning, there was about a two-hour wait to vote. As the morning progressed, the line did lessen but it never dropped below an hour wait time.
7. As a result, I am aware of a number of voters who left. And, while they indicated they would try to return, they indicated that they would have difficulty returning. I saw a number of mothers with young children who had

brought their children to expose them to voting. But, some of the children experienced serious “meltdowns.” The moms did leave but committed to return. I do not know whether they did.

8. One of the Express Polls (there were only two at this location) malfunctioned on a number of occasions and had to be unplugged and re-started. That technical problem led to some of the delay.
9. I also observed a number of voters who were told they were in the wrong precinct. Many of those said that they had lived in the same location and voted at the same location for twenty-five years and could not understand why they were being told to vote elsewhere.
10. Another issue I observed related to provisional ballots. One voter who had registered on the October 9 registration deadline was not found in the system. A poll worker said you should never expect to be on the rolls if you registered near or on the deadline. “This,” the poll worker said, “is Georgia.”
11. Other problems that I observed with provisional ballots included people being forced to vote a provisional ballot when their new address was within the same precinct.
12. I believe that all the voters received if they cast a provisional ballot was a simple stub and not an explanation of how to track their ballot. I never overheard any voter being told they had to “cure” their provisional ballots;

instead, they were told, if they asked whether their ballot would count, “Yes, of course it will count.”

13. And, I am aware that, after consulting with the Board of Elections office, the poll workers changed their practices with respect to provisional ballots for changes of address. So, I believe, that some voters in similar situations were treated differently.

14. I give this Declaration and/or Affidavit freely, without coercion, and without any expectation of compensation or other reward.

15. I understand that in giving this Declaration and/or Affidavit, that I am not represented by a lawyer. Nor has any lawyer asked me to be their client or to serve in anyway as anything other than a witness in this litigation.

16. I declare under penalty of perjury that the foregoing is true and correct.

Further affiant sayeth not, this the 11<sup>TH</sup> day of November, 2018.

  
Shannon Gaggero

Sworn to and subscribed before me  
This the 11<sup>TH</sup> day of November, 2018.

  
Notary Public

